

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

HUANG ZHIYANG,

Plaintiff,

v.

45.COM, an Internet domain name, and
JOHN DOE,

Defendants.

Civil Action 1:20-cv-836-LO-IDD

**MEMORANDUM IN SUPPORT OF MOTION FOR WITHDRAWAL OF THE
APPEARANCE OF WILEY REIN LLP AS COUNSEL FOR PLAINTIFF**

Attison L. Barnes, III, and the law firm of Wiley Rein LLP (hereinafter, collectively, the “Firm”), respectfully request leave for the Firm and its attorneys to withdraw as counsel for Plaintiff (the “Client”) in the above-styled action for the following reasons:

1. Pursuant to Rule 1.16(b) of the Virginia Rules of Professional Conduct, the Firm has sufficient grounds to withdraw from this representation. *See* Declaration of David E. Weslow ¶ 3, June 3, 2021, attached hereto as Exhibit A (“Weslow Decl.”).

2. Pursuant to Rule 1.6(a) of the Virginia Rules of Professional Conduct, the Firm is unable to set forth the detailed factual basis for the requested withdrawal in this filing. Weslow Decl. ¶ 4.

3. The Client is aware of the Firm’s intent to withdraw pursuant to 1.16(d) of the Virginia Rules of Professional Conduct and Local Civil Rule 83.1(g). Weslow Decl. ¶ 5.

4. The Client is aware of the evidentiary hearing presently scheduled for June 21, 2021, and undersigned counsel suggests that the Court consider a modest continuance of the hearing date to provide Plaintiff with time to engage new counsel and/or to familiarize himself with the Court's rules and procedures for *pro se* parties.

5. The Firm contacted local counsel and lead counsel for the Movant seeking consent to this Motion and, as of the time of filing, has not received a response. The undersigned will update the Court upon receipt of a response.

WHEREFORE, the Firm respectfully requests that the Court enter an Order granting Wiley Rein LLP, and all attorneys associated with Wiley Rein LLP, leave to withdraw as counsel for Plaintiff in this matter and grant such further relief as the Court deems proper.

Dated: June 4, 2021

By: /s/ Attison L. Barnes, III /s/
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CERTIFICATE OF SERVICE

I, Attison L. Barnes, III, hereby certify that on June 4, 2021, I electronically filed the foregoing by using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Attison L. Barnes, III /s/

Attison L. Barnes, III, Esq. (VA Bar No. 30458)

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